

Exhibit “2”

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AFFIDAVIT OF COURTNEY G. SWEET, ESQ.

I, Courtney G. Sweet, Esq., having first been duly sworn, and under penalty of perjury, state as follows:

1. I am at least 18 years of age and I am lead counsel for MUSTANG RANCH PRODUCTIONS, LLC and L. LANCE GILMAN in his individual capacity (together, "Mustang Defendants").

2. This Declaration is made in support of Mustang Defendants' Motion for Sanctions ("Motion").

9 3. From February 9, 2024 to the present, as set forth more fully in the Motion and the
10 attached billing statements, Mustang Defendants have incurred attorneys' fees and costs totaling
11 \$36,636.04 in defending this lawsuit.

12 4. A true and correct detailed billing statement of attorneys' fees incurred by Mustang
13 Defendants in this matter is attached to the Motion.

14 5. I have practiced law in Nevada since 2007 and have focused my practice primarily on
15 civil litigation and real estate.

16 6. I have acted as lead or second counsel in approximately fifteen trials during that time,
17 approximately half of which were jury trials, and several other arbitrations and mediations.

18 7. I have also appeared in district and appellate courts throughout the state of Nevada on
19 oral arguments and evidentiary hearings and I am licensed to practice in all state and federal courts
20 in both Nevada and California.

21 8. During my time in practice, I have represented a variety of clients including small and
22 large businesses on matters related to contract disputes, business transactions, and many other civil
23 litigation topics.

24 9. I have also represented the Mustang Defendants or their affiliates in numerous matters
25 related to the enforcement and applicability of prostitution laws over the course of my career.

26 10. I earned my Bachelor of Arts from the Robert D. Clark Honors College of the
27 University of Oregon and my J.D. from the University of Notre Dame Law School.

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1 11. My standing in the Northern Nevada legal community is high: I am rated AV
2 Preeminent by Martindale-Hubbell, have been repeatedly selected to the Thompson Reuters' Super
3 Lawyers Mountain States Rising Star list, and was among the recipients of the "Twenty Under 40"
4 award from the Reno Gazette-Journal in 2013.

5 12. My hourly rate is \$450.00 per hour, which is commensurate with my skill and
6 experience.

7 13. The Northern Nevada legal market supports my full rates.

8 14. Defense of this lawsuit required a proportionate amount of work from Mustang
9 Defendants' counsel, especially in light of the seriousness of the allegations levied against them.

10 15. The Mustang Defendants were being sued for slavery and sex trafficking, with
11 numerous salacious allegations levied against them. Doe's Counsel had also actively sought publicity
12 for these allegations. As such, counsel ensured that the defense being prepared was adequate to meet
13 the seriousness of the lawsuit.

14 16. As shown in the supporting documentation, the attorneys representing the Mustang
15 Defendants devoted a proportionate amount of time to this matter given the seriousness of the
16 allegations.

17 17. These fees were incurred as a direct result of Doe's Counsel multiplying these
18 proceedings unreasonably and vexatiously as set forth in more detail in the Motion.

18. For these reasons, the attorneys' fees sought in the Motion are reasonable.

19. All of these fees and costs were reasonably, necessary, and actually incurred.

21 20. I declare under penalty of perjury under the law of the State of Nevada that the
22 foregoing is true and correct. /

23 Executed at Reno, Nevada this _____ day of May, 2025.

~~COURTNEY G. SWEET, ESQ.~~
Attorney for the Mustang Defendants